

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION

JENNIFER VETRANO,	§	
	§	
Plaintiff,	§	
	§	
v.	§	
	§	Civil Action No.
JOHN BRDA, ALLISON CHRISTILAW,	§	
MBA, ICD.D B, JOHN R. HARDING,	§	
UZI SASSON, DAN EATON ESQ,	§	7:24-CV-00325-DC-RCG
MAURICE GUITTON, ERIC M. LESLIE,	§	
PHILIPPE MORALI, KEN HANNAH,	§	
STEEN KARSBO, JOHN DOES 1-20,	§	
JANE DOES 1- 20,	§	
	§	
Defendants.	§	

**DEFENDANT ALLISON CHRISTILAW’S
UNOPPOSED MOTION TO EXTEND PLEADING DEADLINE**

Defendant Allison Christilaw (“Christilaw”), without waiver of her contention that this Court lacks personal jurisdiction, files this unopposed motion seeking an extension of her deadline to move, answer, or otherwise respond to Plaintiff’s Amended Complaint [ECF No. 3] until June 16, 2025, which is consistent with the extension granted to co-Defendant John Brda [*see* ECF No. 8]. In support of this Motion, Christilaw respectfully shows the Court as follows:

1. Plaintiff filed a Complaint on December 9, 2024. [ECF No. 1] This Complaint did not name Christilaw as a defendant.

2. Plaintiff filed an Amended Complaint, spanning nearly 70 pages and 277 paragraphs, against dozens of defendants, with at least 7 causes of action on December 27, 2024. [ECF No. 3] This Amended Complaint added Christilaw as a defendant.

3. On February 10, 2025, Plaintiff requested an issuance for summons [ECF No. 4], which was issued on February 13, 2025. [ECF No. 5] On March 24, 2025, Christilaw was served with the Amended Complaint, and so her deadline to move, answer, or otherwise respond to the Amended Complaint is currently April 14, 2025.

4. There is good cause, pursuant to Federal Rule of Civil Procedure 6(b), for an extension because on February 26, 2025, the Plaintiff requested a 90-day extension of time to serve the summons on certain other defendants [ECF No. 6], which the Court granted. Based on the Court's docket, Christilaw believes other defendants remain to be served.

5. Additionally, Plaintiff was unopposed to an extension to respond to the Amended Complaint by another defendant, Defendant John Brda, [ECF No. 8] which the Court granted, extending John Brda's response deadline to June 16, 2025.

6. Further, undersigned counsel is aware of at least three other matters pending before your Honor where no responsive pleadings have been filed, with common parties, and common questions of law and fact, which include the following:

- *Willcot v. SEC, et al.*, No. 7:24-cv-317 (W.D. Tex. Dec. 6, 2024);
- *Spears v. Next Bridge Hydrocarbons Inc., et al.*, No. 7:24-cv-321 (W.D. Tex. Dec. 6, 2024); and
- *Pease v. SEC, et al.*, No. 7:24-cv-322 (W.D. Tex. Dec. 9, 2024).

7. Good cause for this extension is made because it would assist in the efficient presentation to the Court of Christilaw's defenses, along with the other defendants, and promote judicial economy.

8. Accordingly, Christilaw respectfully requests that the Court extend her deadline to move, answer, or otherwise respond to Plaintiff's Amended Complaint to June 16, 2025.

9. This is Christilaw's first request for an extension of time.

10. This extension is not sought for purposes of delay, but so that justice may be done.

11. Undersigned counsel conferred with *pro se* Plaintiff. Plaintiff stated she is unopposed to the requested extension.

Dated: April 9, 2025

Respectfully submitted,

NORTON ROSE FULBRIGHT US LLP

By: /s/ James V. Leito IV

Richard Krumholz, Bar No. 00784425

richard.krumholz@nortonrosefulbright.com

James V. Leito IV, Bar No. 24054950

james.leito@nortonrosefulbright.com

Kira Latham, Bar No. 24120638

kira.latham@nortonrosefulbright.com

2200 Ross Avenue, Suite 3600

Dallas, Texas 75201-7932

Telephone: (214) 855-8000

Facsimile: (214) 855-8200

Attorneys for Defendant Allison Christilaw

CERTIFICATE OF CONFERENCE

Pursuant to the Western District of Texas's Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant Christilaw, he conferred with Plaintiff Jennifer Vetrano via email. Plaintiff has indicated that she is not opposed to the extension requested herein.

/s/ James V. Leito IV

James V. Leito IV

CERTIFICATE OF SERVICE

This foregoing pleading was served on all counsel of record in compliance with Rule 5 of the Federal Rules of Civil Procedure on April 9, 2025.

/s/ James V. Leito IV

James V. Leito IV